

1:47 pm, Jul 19 2022

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY JJ Deputy

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH THE
GOOGLE ACCOUNTS
jazzycouture2006@gmail.com,
tamajaal2016@gmail.com,
bagnontiti@gmail.com, bagnontitii@gmail.com,
aduncan418@gmail.com,
arwright135@gmail.com,
thatcher022@gmail.com and
my2als@gmail.com:
THAT ARE STORED AT PREMISES
CONTROLLED AND HOSTED BY
GOOGLE, INC.

Misc No. 22-mj-1689-AAQ

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION UNDER RULE 41 FOR
WARRANTS TO SEARCH AND SEIZE**

I, Joshua T. Kimrey, a Special Agent with the United States Army Criminal Investigation Division (CID), Major Procurement Fraud Field Office (MPFFO), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a warrant to search information associated with certain accounts that are stored at premises owned, maintained, controlled, or operated by Google Inc., 1600 Amphitheater Parkway, Mountain View, California. The information to be searched is described in the following paragraphs and Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google to disclose to the government copies of the information (including the content of communications) further

described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I am a Special Agent with Army CID and have been so employed since September 2014. I am currently assigned to the Washington Metro Fraud Resident Agency at Fort Belvoir, VA. Prior to becoming a federal law enforcement officer in 2014, I was an active duty Soldier in the United States Army. I have attended and completed trainings in criminal investigations and contract fraud at the Federal Law Enforcement Training Center, to include the completion of the Procurement Fraud Investigation Training Program, Defense Acquisition University (DAU) and various courses under the Association of Certified Fraud Examiners (ACFE). Among other investigative responsibilities, I conduct investigations into alleged criminal violations relating to federal contract fraud. I conduct interviews, participate in the execution of search and arrest warrants, and gather evidence using various investigative techniques. I am a “federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, and I am authorized to execute warrants issued under the authority of the United States.

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. In my training and experience, I have learned that Google provides a variety of on-line services, including electronic mail (“email”) access, to the public. Google allows subscribers to obtain email accounts at the domain name mail.google.com or gmail.com, like the email account[s] listed in Attachment A. Subscribers obtain an account by registering with

Google. During the registration process, Google asks subscribers to provide basic personal information. Therefore, the computers of Google are likely to contain stored electronic communications (including retrieved and unretrieved email for Google subscribers) and information concerning subscribers and their use of Google services, such as account access information, email transaction information, and account application information. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

5. Additionally, the facts as set forth in this affidavit show there is probable cause to believe that violations of Conspiracy to commit Health Care and Wire Fraud in violation of 18 U.S.C. § 1349, and Fraud by Wire in violation of 18 U.S.C. § 1343 (collectively referred to as the "TARGET OFFENSES") have been committed by Rhonda PAUL, Bagnon TITI, Alfred DUNCAN, Wesley WILLIAMS, Antoine WRIGHT, and Harriet JACKSON, further described in email accounts in Attachment A. There is also probable cause to search the information described in Attachment A for evidence of these crimes further described in Attachment B.

JURISDICTION

6. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is "a district court of the United States that has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

7. On December 17, 2013, the U.S. Army, Northern Region Contract Office, Fort Belvoir, VA, awarded Infused Solutions LLC ("Infused"), 22636 Davis Drive, Suite 600, Sterling, VA 20164, a professional service contract with Walter Reed National Military Medical

Center (“WRNMMC”), Bethesda, MD, initially valued at approximately \$6.7M with a contract renewal awarded to Infused in December 2016. Specifically, contract number W91YTZ-14-D-M111 (“M111”) was established to review, validate, and ensure “patients’ encounters” medical codes were input accurately into Walter Reed’s medical database. Infused was awarded the contract as the prime contractor and was compensated based on the number of patient encounters reviewed and input into the WRNMMC system. The case was initiated when Army CID received a complaint from a co-owner of Infused, regarding claims identified of fraudulent representations resulting in the billing for services not rendered on M111.

8. Specifically, the complainant identified an agreement between Akbar MASOOD, Infused co-owner, and a subcontractor company named HMA Solutions LLC. (“HMA”), 6412 Auburn Avenue, Riverdale, MD, to assist in providing medical coding and auditing support on M111. The complainant stated the agreement with HMA was not approved by Infused. The complainant further explained any type of agreement with a subcontractor required his approval based on the business’ operating agreement established between the owners. When the complainant confronted MASOOD about the relationship with HMA, MASOOD told the complainant that a Government official had recommended HMA to assist Infused with the coding work. The Government official MASOOD named at WRNMMC, was interviewed wherein they denied knowledge of recommending a company or even heard of a company named HMA to MASOOD. On January 23, 2017, and April 4, 2017, a fraudulent consulting or teaming agreement was created between Infused, MASOOD, and “Renee Connor” of HMA. The actual Renee Connor was interviewed on February 7, 2020, and stated she had never heard of a

company named HMA and further denied having any knowledge of such agreement nor had she ever signed any such agreement.

9. According to the complainant, MASOOD established HMA with Michelle PEEBLES and Harriet JACKSON solely for the purpose of submitting fraudulent invoices. According to the U.S. Government's Contracting Officer Representative ("COR"), the Government had no knowledge of HMA supporting contract M111 as a subcontractor.

10. In addition to the establishment of HMA and billing the Government, PEEBLES, MASOOD, and JACKSON hired additional employees under Infused for submitting fraudulent invoices to the Government. The individuals were PAUL, WILLIAMS, DUNCAN, TITI, and WRIGHT. All five of whom, were not certified medical coders/auditors; however, each of them submitted invoices by email on a monthly basis. Each of them submitted a consulting agreement with Infused. Collectively, they billed the Government over \$1 million for work they did not complete. In the subpoena response from American Academy of Professional Coders (AAPC) and American Health Information Management Association (AHIMA) there were no accounts for PAUL, DUNCAN, WILLIAMS, or TITI. Additionally, all coders required a security background check and fingerprinting to obtain a Common Access Card (CAC). The CAC was required to access the WRNMMC online system and numerous online medical databases used in the Department of Defense. None of the aforementioned individuals possessed a CAC.

11. On March 17, 2022, a grand jury in this District returned an Indictment charging MASOOD, JACKSON, PEEBLES, JUDITH RUSS, PAUL, TITI, DUNCAN, and WILLIAMS with Conspiracy to Commit Health Care and Wire Fraud in violation of 18 U.S.C. 1349; multiple counts of wire fraud in violation of 18 U.S.C. § 1343; MASOOD, JACKSON and PEEBLES with Aggravated Identity Theft in violation of 18 U.S.C. § 1028A; and JUDITH RUSS with

Conflict of Interest by a Government Employee in violation of 18 U.S.C. § 208. This affidavit is submitted in support of a warrant that seeks to collect additional evidence in the form of emails between members of this charged conspiracy as well as those of additional potential defendants.

Rhonda Paul

12. PAUL was a friend of PEEBLES' and JACKSON's who worked primarily as a receptionist at an outpatient medical clinic and worked part-time as an Uber and Lyft driver. In January 2017, she submitted, via email, a consulting agreement, employee personnel form, W-9 Tax Form, and direct deposit enrollment form. Between February 2017 and February 2019, PAUL submitted false monthly invoices utilizing her personal email account as jazzycouture2006@gmail.com. She submitted her invoices to Ms. Gillespie, where Ms. Gillespie would request Ms. PEEBLES validate the work completed. Typically, Ms. PEEBLES simply

responded with an email stating “Approved.” An example of these scheme is an email from Ms.

Paul on December 3, 2017, in the email below:

To Kristine Gillespie <kgillespie@infusedsolutions.com>
From mpeebles@infusedsolutions.com
12/4/2017 7:05:39 PM
/d/yyyy)
Subject Re: Invoice
Body Approved

"Be the change you want to see in the world"

On Dec 4, 2017, at 7:06 AM, Kristine Gillespie <kgillespie@infusedsolutions.com> wrote:

Hi Michelle,

Can you please verify these encounters?

----- Forwarded message -----
From: **rhonda paul** <jazzycouture2006@gmail.com>
Date: Sun, Dec 3, 2017 at 5:47 PM
Subject: Invoice
To: Kristine Gillespie <kgillespie@infusedsolutions.com>

Thank you.

--

Thank you,

Kristine Gillespie
Human Resources Specialist
Direct: (703) 349-0624 / Fax: ([\(571\) 350-9099](tel:(571)350-9099)) or ([\(571\) 266 0153](tel:(571)266-0153))
kgillespie@infusedsolutions.com

INFUSED
SOLUTIONS

People Powered, Process Driven, Innovative Solutions and Technologies
22636 Davis Drive, Suite 100; Sterling, VA 20164 www.infusedsolutions.com

This e-mail message is for the sole use of the intended recipient(s) and may contain Infused Solutions, LLC Private or Infused Solutions, LLC Proprietary Information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not an intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

<Rhonda Paul Infused Dec invoice.xlsx>

As referenced in the email, Ms. Paul attached the following invoice:

Rhonda Paul

INVOICE

SOLD TO:
Name: Infused Solutions

12/2/2017

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
6,987	OutpatientEncounters	1.80	\$12,576.60
0	Inpatient Encounters	12.10	\$0.00
		SUBTOTAL	12,576.60
		TAX	
		FREIGHT	
			\$12,576.60
			PAY THIS AMOUNT

On December 8, 2017, Ms. Paul's Bank of America (BoA) Account Number XXXXXXXXX2032 reflects the deposit of \$12,576.60.

12/08/17 INFUSED SOLUTION DES:DIRECT DEP ID:935805212349K8U INDN:PAUL,RHONDA C CO 12,576.60
ID:9111111103 PPD

After the deposit, Ms. Paul made serial, high-dollar ATM cash withdrawals.

12/11/17	BKOFAMERICA ATM 12/11 #000008134 WITHDRWL BELTWAY PLAZA GREENBELT MD	-4,000.00
12/11/17	Online Banking Transfer Conf# 75b1086bb; bowman, CAROLYN	-90.00
12/12/17	Online Banking transfer to CHK 5391 Confirmation# 6107537540	-200.00
12/12/17	Online Banking Transfer Conf# 5cf1e5127; bowman, CAROLYN	-45.00
12/12/17	BKOFAMERICA ATM 12/12 #000008536 WITHDRWL BELTWAY PLAZA GREENBELT MD	-6,000.00
12/13/17	Online Banking transfer to CHK 5391 Confirmation# 5117501144	-246.00
12/13/17	BKOFAMERICA ATM 12/13 #000008714 WITHDRWL BELTWAY PLAZA GREENBELT MD	-1,200.00

In my training and experience, it is typical for criminals to submit fraudulent invoices, receive payment, and attempt to transfer funds by cash instead of transferring between bank accounts in

an attempt hide who the funds are sent to. A Google subpoena response indicated subscriber information for jazzycouture2006@gmail.com as belonging to PAUL with an account recovery phone number of 202-277-4168, belonging to PAUL. On March 14, 2022, an email preservation request was submitted to Google for this account.

Wesley Williams / Harriet Jackson

13. Wesley WILLIAMS was JACKSON's boyfriend who worked as a barber. He had no experience or credentials as a medical coder. Between March and August 2017, WILLIAMS submitted monthly invoices from tamajaal2016@gmail.com. For example, on June 4, 2017, Ms. Peebles sent filled out invoice to Ms. Jackson at my2als@gmail.com in which it was indicated WILLIAMS was billing for completed work. The following day, June 5, 2017, Mr. Williams submitted an invoice from tamajaal2016@gmail.com to Ms. Gillespie at kgillespie@infusedsolutions.com. The invoice was identical to the one sent by Ms. Peebles. In addition to this example, on at least two other occasions, in July and September 2017, Peebles

provided Williams' invoice to the my2als@gmail.com account on the same day as Williams sending the same invoice to Gillespie for payment. An example is below:

Tags	invoices w emails
To	Harriett Jackson < my2als@gmail.com >
From	Michelle Peebles < mpeebles@infusedsolutions.com >
Date/Time - UTC-05:00 (M/d/yyyy)	6/4/2017 9:34:38 PM
Subject	invoice
Body	<p>--</p> <p><i>Michelle Peebles, CPC</i> <i>Site Manager</i> <i>P: (703) 943-7546</i> mpeebles@infusedsolutions.com</p> <p>Infused Solutions LLC 22636 Davis Drive, Suite 100 Sterling, VA 20164</p>
Headers	From: 1569330380689643873@xxx Mon Jun 05 02:34:38 +0000 (2017) 1569330380689643873 X-GM-THRID: 1569330380689643873 X-Gmail-Labels: Archived,Sent MIME-Version: 1.0 Received: by 10.50.38.169 with HTTP; Sun, 4 Jun 2017 19:34:38 -0400 (EDT) Date: Sun, 4 Jun 2017 22:34:38 -0400 (EDT) Delivered-To: mpeebles@infusedsolutions.com Message-ID: <CAO5ZMG8Tj9uKfq9bRFrRbdb5fCdMKhzAw4 Subject: invoice From: Michelle Peebles < mpeebles@infusedsolutions.com > To: Harriett Jackson < my2als@gmail.com > Content-Type: multipart/mixed; boundary="bcaec554008e2"
Attachment Name(s)	W Williams Infused Solutions Juner Invoice.xlsx

Tags	hmasolutions
To	Kristine Gillespie < kgillespie@infusedsolutions.com >
From	Wesley Williams < tamajaal2016@gmail.com >
- UTC-05:00 (M/d/yyyy)	6/5/2017 11:26:52 AM
Subject	June Invoice
Body	<p>Good Afternoon,</p> <p>Here's my invoice for June please let me know if you have any questions.</p> <p>Wesley</p> <p>--</p> <p>Wesley J. Williams</p>



HARRIET M SOUMAH | Account # 2290 1021 0153 | May 17, 2017 to June 16, 2017

View Checking Account

Account summary - continued

Annual Percentage Yield Earned this statement period: 0.01%.
Interest Paid Year To Date: \$2.18.

Deposits and other additions

Date	Description	Amount
05/22/17	Online Banking transfer from SAV 9647 Confirmation# 1548640967	15,000.00
05/23/17	Online Banking transfer from SAV 9647 Confirmation# 2556836132	1,250.00
05/24/17	BKOFAMERICA MOBILE 05/24 3558005327 DEPOSIT	*MOBILE FL 716.00
05/24/17	BKOFAMERICA MOBILE 05/24 3558005509 DEPOSIT	*MOBILE FL 2.94
05/25/17	CASE HEALTHCARE DES:DIRECT DEP ID:925803064021RI2 INDN:JACKSON,HARRIETT CO ID:9111111101 PPD	3,454.17
05/30/17	BKOFAMERICA MOBILE 05/27 3559066240 DEPOSIT	*MOBILE FL 4,400.00
05/30/17	BKOFAMERICA MOBILE 05/28 3559263133 DEPOSIT	*MOBILE FL 500.00
05/31/17	Online Banking Transfer Conf# 10442ze4a; VASS, LESLIE	500.00
06/05/17	Online Banking Transfer Conf# 1fjyhj738; VASS, LESLIE	425.00
06/09/17	CASE HEALTHCARE DES:DIRECT DEP ID:447542416154RI2 INDN:JACKSON,HARRIETT CO ID:9111111101 PPD	2,700.00
06/12/17	BKOFAMERICA MOBILE 06/12 3564635133 DEPOSIT	*MOBILE FL 8,582.80
06/12/17	BKOFAMERICA MOBILE 06/12 3564635518 DEPOSIT	*MOBILE FL 5,600.00
06/12/17	BKOFAMERICA MOBILE 06/12 3564634686 DEPOSIT	*MOBILE FL 4,800.00
06/16/17	Interest Earned	0.26
Total deposits and other additions		\$47,931.17

Wesley Williams

INVOICE

Contractor Address

SOLD TO:
Name: Infused Solutions

6/5/2017

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
3,975	OutpatientEncounters	1.80	\$7,155.00
118		12.10	\$1,427.80
		SUBTOTAL	8,582.80
		TAX	
		FREIGHT	
			\$8,582.80
		PAY THIS AMOUNT	

Payment from this invoice was sent directly to Jackson's BoA Account ending in 0153: The recovery email for google email tamajaal2016@gmail.com is my2als@gmail.com, registered to Ms. Jackson. The recovery phone number was listed as 240.308.4030, registered to Mr. Williams. On March 14, 2022, an email preservation request was submitted to Google for the accounts: tamajaal2016@gmail.com and my2als@gmail.com.

14. In April 2017, JACKSON used the my2als@gmail.com address to assist in the creation of a fraudulent Consulting Agreement between Infused and HMA signed by "Renee Connor." Specifically, on April 2, 2017, MASOOD emailed Gillespie the following text, "Please see the agreement for WR hourly ready to be sent out. This agreement is for Outpatient Records Coding Only." The attachment to the email was entitled, "Corp. Consulting Agreement Template (Hourly).doc". This document was an unsigned draft version of the HMA Consulting Agreement with Infused. On April 3, 2017, Gillespie forwarded this attachment to PEEBLES with the text, "Attached is the agreement that Akbar created over the weekend." On April 5, 2017, PEEBLES emailed JACKSON at the email address, my2als@gmail.com, with no text in the body of the email. Attached to the email was the same document entitled, "Corp. Consulting Agreement Template (Hourly).doc." On April 6, 2017, the signed and formatted version of this document was emailed from "Connor's" HMA email address to Infused. The document with "Connor's" purported signature was entitled "Corp. Consulting Agreement Template (Hourly) (1)-signed.pdf". Based on my review of these emails, PEEBLES, JACKSON, and MASOOD were involved in creating the fraudulent Consulting Agreement with Connor's signature.

Alfred Duncan

15. DUNCAN was an associate of Peebles who worked as a musician and had no experience as a medical coder nor had the credentials. Between 2017 and 2019, Duncan

submitted monthly invoices to Infused from his email account of aduncan418@gmail.com. For instance, on July 3, 2017, Mr. Duncan emailed Ms. Gillespie at kgillespie@infusedsolutions.com his July invoice:

Tags	hmasolutions
To	Kristine Gillespie < kgillespie@infusedsolutions.com >, Michelle Peebles < mpeebles@infusedsolutions.com >
From	Antonio Duncan < aduncan418@gmail.com >
- UTC-05:00 (M/d/yyyy)	7/3/2017 12:55:25 PM
Subject	July Invoice
Body	<p>Hello Michelle & Kristine,</p> <p>Please find my July Invoice attached.</p> <p>Thank You.</p>

Alfred Duncan		INVOICE																																
6944 Wasilker Mill Road #D1 Capitol Heights, MD 20743																																		
SOLD TO: Name: Infused Solutions		7/3/2017																																
<table border="1"> <thead> <tr> <th>QUANTITY</th> <th>DESCRIPTION</th> <th>UNIT PRICE</th> <th>AMOUNT</th> </tr> </thead> <tbody> <tr> <td>4,922</td> <td>OutpatientEncounters</td> <td>1.80</td> <td>\$8,859.60</td> </tr> <tr> <td>169</td> <td>Inpatient Encounters</td> <td>12.10</td> <td>\$2,044.90</td> </tr> <tr> <td colspan="2"></td> <td>SUBTOTAL</td> <td>10,904.50</td> </tr> <tr> <td colspan="2"></td> <td>TAX</td> <td></td> </tr> <tr> <td colspan="2"></td> <td>FREIGHT</td> <td></td> </tr> <tr> <td colspan="2"></td> <td></td> <td>\$10,904.50</td> </tr> <tr> <td colspan="2"></td> <td></td> <td>PAY THIS AMOUNT</td> </tr> </tbody> </table>			QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	4,922	OutpatientEncounters	1.80	\$8,859.60	169	Inpatient Encounters	12.10	\$2,044.90			SUBTOTAL	10,904.50			TAX				FREIGHT					\$10,904.50				PAY THIS AMOUNT
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4,922	OutpatientEncounters	1.80	\$8,859.60																															
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Tags	hmasolutions
To	Kristine Gillespie <kgillespie@infusedsolutions.com>, Michelle Peebles <mpeebles@infusedsolutions.com>
From	Antonio Duncan <aduncan418@gmail.com>
- UTC-05:00 (M/d/yyyy)	7/3/2017 12:55:25 PM
Subject	July Invoice
Body	<p>Hello Michelle & Kristine,</p> <p>Please find my July Invoice attached.</p> <p>Thank You.</p>

On July 10, 2017, Mr. Duncan's SunTrust Bank account XXXXXX9851, received a deposit mirroring the invoiced amount, \$10,904.50. After the deposit, Mr. Duncan made two high-dollar withdrawals, totaling \$10,700.

TRANSACTION HISTORY					
DATE	CHECK #	TRANSACTION DESCRIPTION DETAILS	DEPOSITS/ CREDITS	WITHDRAWALS/ DEBITS	CURRENT BALANCE
06/24		BEGINNING BALANCE			27.78
07/05		CHECK CARD PURCHASE TR DATE 07/04 DOLLAR TREE WALDORF MD	11.66		16.12
07/10		ELECTRONIC/ACH CREDIT INFUSED SOLUTION DIRECT DEP *****2886K8U	10,904.50		
07/10		MOBILE APP TRANSFER TO 00001000161969851	100.00		
07/10		MOBILE APP TRANSFER TO 00001000161969851	100.00		
07/10		MOBILE APP TRANSFER TO 00001000180550336	5,300.00		5,420.62
07/14	80	MOBILE APP TRANSFER FROM 00001000180550336 CHECK	53.00		
		NETTIER BANK MANAGEMENT INC	5,400.00	53.62	

In my training and experience, it is typical for criminals to submit fraudulent invoices, receive payment, and transfer funds to other accounts in an attempt to hide payment. On March 14, 2022, an email preservation request was submitted to Google for this account.

Bagnon Titi

16. TITI was Peebles' boyfriend who worked as a Washington Metro Area Transit Authority Bus Operator and had no experience and/or credentials as a medical coder. On April 27, 2017, Ms. Peebles emailed Ms. Gillespie stating that TITI would start working under Infused on April 26, 2017, as an outpatient/inpatient medical coder. Ms. Peebles provided TITI's email address as bagnontiti@gmail.com. On May 4, 2017, Ms. Peebles emailed an invoice on TITI's behalf. TITI's email bagnontiti@gmail.com was carbon copied on the email. A Google subpoena

response was associated with “Jacques Retro”, the middle name of TITI. The recovery phone number listed was 202-710-0639, that was listed as belonging to TITI. Beginning on June 5, 2017, invoices were submitted from [bagnontitii@gmail.com \(with an extra “i”\)](mailto:bagnontitii@gmail.com (with an extra ‘i’)), different from the initial email address Ms. Peebles provided. The email was sent to Ms. Gillespie at kgillespie@infusedsolutions.com where she requested Ms. Peebles to approve and Ms. Peebles responded, “Approved.”

To	Kgillespie@infusedsolutions.com
From	M Peebles <bagnontitii@gmail.com>
Subject	6/5/2017 12:00:25 PM
Body	<p>Fwd: B titi Infused May Invoice</p> <p>Good Morning,</p> <p>Please find attached my invoice for June.</p> <p>Have a good day, thank you.</p> <p>-Bagnon</p>

Bagnon Titi		INVOICE	
7973 Riggs Road #202 Hyattsville, MD 20783			
SOLD TO: Name: Infused Solutions		6/5/2017	
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
2,877	OutpatientEncounters	1.80	\$5,178.60
128	Inpatient Encounters	12.10	\$1,548.80
		SUBTOTAL	6,727.40
		TAX	
		FREIGHT	
			\$6,727.40
		PAY THIS AMOUNT	

MICHELLE PEEBLES
BAGNON J TITI
6412 AUBURN AVE
RIVERDALE MD 20737-1615

PAGE 1

0
01

ACCOUNT NUMBER	ACCOUNT TYPE			STATEMENT PERIOD	
02223-2884-3	USAA CLASSIC CHECKING			05/31/17 - 06/30/17	
BALANCE LAST STATEMENT	NO OF DEBITS PAID	TOTAL AMOUNT OF DEBITS PAID	NO. OF DEP	TOTAL AMOUNT OF DEPOSITS MADE	SERVICE CHARGES
0.00	28	2,511.93	2	6,727.44	.00

Please examine immediately and report if incorrect. If no report is received within 60 days, the account will be considered correct.

	TOTAL NONSUFFICIENT FUNDS (NSF) FEES	TOTAL OVERDRAFT (OD) FEES
THIS STATEMENT	0.00	0.00
THIS YEAR'S STATEMENTS	0.00	0.00

Note: Fee reversals/re-funds made by USAA will not reduce the totals on this chart.

THIS ACCOUNT WILL SOON BE KNOWN AS USAA CLASSIC CHECKING.
THE NAME WILL CHANGE, BUT THE SECURITY, FEATURES AND
BENEFITS WILL REMAIN THE SAME.

DEPOSITS AND OTHER CREDITS
DATE.....AMOUNT TRANSACTION DESCRIPTION
06/08 6,727.40 ACH CREDIT 060917
INFUSED SOLUTION DIRECT DEP *****4K8U
06/30 0.04 INTEREST PAID

A Google subpoena response indicated the email address bagnontitii@gmail.com was registered to “BAGNON TITI” with recovery phone number 703.943.7546 registered to Ms. Peebles, making it likely that Ms. Peebles exercised primary, if not exclusive, control over this account.

The payment for this invoice was made by Infused to a joint USAA checking account ending in 8843 held by TITI and PEEBLES. During a later interview with agents investigating this case, TITI acknowledged being paid by Infused and claimed his girlfriend, Ms. Peebles, did all of the work for him. On March 14, 2022, an email preservation request was submitted to Google for this account.

Antoine Wright

17. Antoine WRIGHT was an Infused employee between 2015 and 2017. According to emails I reviewed, he was hired by Peebles on May 15, 2015. Peebles forwarded a direct deposit form for Bank of America account number ending in 0215 to the Infused employee handling payroll. The form was initially submitted to Peebles by WRIGHT's mother, Tanya Hatcher, at thatcher022@gmail.com, who was also a medical coder, though not with Infused. On May 21, 2015, Ms. Gillespie sent Peebles an email asking whether Peebles submitted a consulting agreement for WRIGHT before engaging his services. Peebles responded that she had not because, "they put our backs to the fire at W[alter] R[eed] and we had staff out. He helped to meet our productivity in a pickle which I KNOW is not the correct procedure." On May 29, 2017, Wright submitted employment paperwork to Infused which included an application for employment, employee data sheet, Tax Form W-4, Driver's License, and Social Security Card. Between October 2015 and continuing through January 2016, Wright submitted the same invoice each month; claiming he completed 1,162 APV encounters totaling \$2,103.22. Starting in March 2016, Wright submitted monthly invoices for payment. The highest amount he claimed was in May 2017, when he submitted an invoice for \$7,658.11. Wright initially sent Peebles an invoice claiming 1,740 Outpatient Encounters totaling \$3,149.40 but the same day,

Peebles, appears to have modified that invoice by increasing the claimed outpatient encounters to 4,231 for a total of \$7,658.11. Wright then submitted that invoice to Ms. Gillespie where Peebles “approved” the invoice (below):

To	Kristine Gillespie <kgillespie@infusedsolutions.com>
From	Antoine Wright <arwright135@gmail.com>
- UTC+00:00	5/2/2017 1:06:21 PM
(M/d/yyyy)	
Subject	APV's
Body	<p>See attachment.</p> <p>A. Wright</p>

Attachment Name(s) Copy of Wright Invoice Infused Solution April Invoice (1).xlsx

Antoine Wright		INVOICE					
1535 Sherwood Ave Baltimore, MD 21239							
SOLD TO: Name: Infused Solutions		INVOICE NUMBER	25				
		INVOICE DATE	May 2, 2017				
<table border="1"> <tr> <td colspan="4"></td> </tr> </table>							
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT				
4,231	Outpatient Encounters	1.81	\$7,658.11				
		SUBTOTAL	7,658.11				
		TAX	0.00				
		FREIGHT					
			\$7,658.11				
		PAY THIS AMOUNT					

On May 10, 2017, Infused paid this invoice to a joint Bank of America account held by HATCHER and WRIGHT (XXXXXXXX0215). Subsequently, bank records show multiple transfers from the 0215 account to Peebles' BoA account ending in 1419.

18. Emails obtained from Infused Solutions indicate Wright consistently submitted the monthly invoices from his email arwright135@gmail.com to Peebles wherein she approved the invoice per a request by Ms. Gillespie. According to Google subscriber information, arwright135@gmail.com was subscribed to "Antoine Wright" with a recovery phone number of 443.208.6087, which was listed to Tanya Hatcher, Wright's mother. According to the Google, thatcher022@gmail.com was subscribed to "Tanya H" with recovery phone number 443.208.6087, Hatcher's phone number, and the same used as the recovery phone on to Wright's accountsemail account. Emails indicate Wright assisted Peebles with occasional projects but Wright could not enter the data because he did lacked access to the required systems. On March 14, 2022, an email preservation request was submitted to Google for both accounts.

19. In addition to her requirement to approve invoices as the Site Manager, PEEBLES provided the total number of encounters completed by all Infused employees and subcontracted employees each month to Barbara Rosas, Operations Director at Infused, and others at Infused. These final numbers were then used on the invoice Infused submitted to WRNMMC via Wide Area Work Flow, the Department of Defense's online invoice submission system. WRNMMC then paid Infused and Infused subsequently paid each employee based on their invoice amounts.

21. On March 14, 2022, an email preservation request was submitted to Google for all email accounts noted in Attachment A. On June 8, 2022, an extension to the preservation was submitted for all email accounts.

BACKGROUND CONCERNING GOOGLE¹

22. Google is a United States company that offers to the public through its Google Accounts a variety of online services, including email, cloud storage, digital payments, and productivity applications, which can be accessed through a web browser or mobile applications. Google also offers to anyone, whether or not they have a Google Account, a free web browser called Google Chrome, a free search engine called Google Search, a free video streaming site called YouTube, a free mapping service called Google Maps, and a free traffic tracking service called Waze. Many of these free services offer additional functionality if the user signs into their Google Account.

23. In addition, Google offers an operating system (“OS”) for mobile devices, including cellular phones, known as Android. Google also sells devices, including laptops, mobile phones, tablets, smart speakers, security cameras, and wireless routers. Users of Android and Google devices are prompted to connect their device to a Google Account when they first turn on the device, and a Google Account is required for certain functionalities on these devices.

24. Signing up for a Google Account automatically generates an email address at the domain gmail.com. That email address will be the log-in username for access to the Google Account.

25. Google advertises its services as “One Account. All of Google working for you.” Once logged into a Google Account, a user can connect to Google’s full suite of services offered

¹ The information in this section is based on information published by Google on its public websites, including, but not limited to, the following webpages: the “Google legal policy and products” page available to registered law enforcement at lers.google.com; product pages on support.google.com; or product pages on about.google.com.

to the general public, described in further detail below. In addition, Google keeps certain records indicating ownership and usage of the Google Account across services, described further after the description of services below.

26. Google integrates its various services to make it easier for Google Accounts to access the full Google suite of services. For example, users accessing their Google Account through their browser can toggle between Google Services via a toolbar displayed on the top of most Google service pages, including Gmail and Drive. Google Hangout, Meet, and Chat conversations pop up within the same browser window as Gmail. Attachments in Gmail are displayed with a button that allows the user to save the attachment directly to Google Drive. If someone shares a document with a Google Account user in Google Docs, the contact information for that individual will be saved in the user's Google Contacts. Google Voice voicemail transcripts and missed call notifications can be sent to a user's Gmail account. And if a user logs into their Google Account on the Chrome browser, their subsequent Chrome browser and Google Search activity is associated with that Google Account, depending on user settings.

27. When individuals register with Google for a Google Account, Google asks users to provide certain personal identifying information, including the user's full name, telephone number, birthday, and gender. If a user is paying for services, the user must also provide a physical address and means and source of payment.

28. Google typically retains and can provide certain transactional information about the creation and use of each account on its system. Google captures the date on which the account was created, the length of service, log-in times and durations, the types of services utilized by the Google Account, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account

via Google's website or using a mobile application), details about the devices used to access the account, and other log files that reflect usage of the account. In addition, Google keeps records of the Internet Protocol ("IP") addresses used to register the account and accept Google's terms of service, as well as the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the Google Account.

29. Google maintains the communications, files, and associated records for each service used by a Google Account on servers under its control. Even after a user deletes a communication or file from their Google Account, it may continue to be available on Google's servers for a certain period of time.

30. In my training and experience, evidence of who was using a Google account and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. This evidence may establish the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion. The examples provided above established that users fraudulently submitted monthly invoices from their Google email account and received payment for it. In order to establish a better understanding of facts, emails before, during, after the invoice submissions, may establish further details within this investigation.

31. Based on my training and experience, messages, emails, voicemails, photos, videos, documents, and internet searches are often created and used in furtherance of criminal activity, including to communicate and facilitate the offenses under investigation. Thus, stored

communications and files connected to a Google Account can provide direct evidence of the offenses under investigation.

32. Account activity may also provide relevant insight into the account owner's state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner's motive and intent to commit a crime (*e.g.*, information indicating a plan to commit a crime), or consciousness of guilt (*e.g.*, deleting account information in an effort to conceal evidence from law enforcement).

33. In addition, emails, instant messages, Internet activity, documents, and contact and calendar information can lead to the identification of co-conspirators and instrumentalities of the crimes under investigation.

34. Therefore, Google's servers are likely to contain stored electronic communications and information concerning subscribers and their use of Google services. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

CONCLUSION

35. Based on the forgoing, I request that the Court issue the proposed search warrant. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Google. Because the warrant will be served on Google, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,

Joshua T. Kimrey

Joshua T. Kimrey
Special Agent
U.S. Army CID

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 22nd day of June 2022.



The Honorable Ajmel A. Qureshi
United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with jazzycouture2006@gmail.com, tamajaal2016@gmail.com, bagnontiti@gmail.com, bagnontitii@gmail.com, aduncan418@gmail.com, arwright135@gmail.com, thatcher022@gmail.com and my2als@gmail.com (“the Accounts”) that are stored at premises owned, maintained, controlled, or operated by Google LLC a company headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

ATTACHMENT B**Particular Things to be Seized****I. Information to be disclosed by Google LLC (“Google”)**

To the extent that the information described in Attachment A is within the possession, custody, or control of Google, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to Google, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on 14 March 2022 with the Google Reference Number 13778863, Google is required to disclose to the government for each account or identifier listed in Attachment A the following information from **1 May 2015 to Present**, unless otherwise indicated:

- a. All business records and subscriber information, in any form kept, pertaining to the Account, including:
 1. All emails and stored communications (1) exchanged between the email accounts listed within Attachment A **and** the following accounts: jazzycouture2006@gmail.com, tamajaal2016@gmail.com, bagnontiti@gmail.com, bagnontitii@gmail.com, aduncan418@gmail.com, arwright135@gmail.com, thatcher022@gmail.com, my2als@gmail.com, peebles32@yahoo.com, abmasood@gmail.com; and (2) associated with the domains @hmasolutionsllc, @infusedsolutions, @case-hcs, @rtmcpa, @mail.mil; (3) all known accounts for Harriet Jackson, Akbar Masood, and Michelle Peebles; and/or (4) that include the terms: “Infused,” “HMA,” or “Walter Reed.”
 2. Names (including subscriber names, user names, and screen names);
 3. Addresses (including mailing addresses, residential addresses, business addresses, and email addresses, including alternate and recovery email addresses);
 4. Telephone numbers, including SMS recovery and alternate sign-in numbers;

5. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions, including log-in IP addresses;
6. Telephone or instrument numbers or other subscriber numbers or identities, including any temporarily assigned network address, SMS recovery numbers, Google Voice numbers, and alternate sign-in numbers
7. Length of service (including start date and creation IP) and types of service utilized;
8. Means and source of payment (including any credit card or bank account number); and
9. Change history.

- b. All device information associated with the Account, including but not limited to, manufacture names, model numbers, serial number, media access control (MAC) addresses, international mobile equipment identifier (IMEI) numbers, FCC ID numbers, Android IDs, and telephone numbers;
- c. Records of user activity for each connection made to or from the Account(s), including, for all Google services, the date, time, length, and method of connection, data transfer volume, user names, source and destination IP address, name of accessed Google service, and all activity logs

Google is hereby ordered to disclose the above information to the government within 14 days of issuance of this warrant.

II. Information to be seized by the government

All information described above in Section I that constitutes evidence of violations of Conspiracy to commit Health Care and Wire Fraud in violation of 18 U.S.C. § 1349, and Fraud by Wire in violation of 18 U.S.C. § 1343 (collectively referred to as the “TARGET OFFENSES”) have been committed by Rhonda PAUL, Bagnon TITI, Alfred DUNCAN, Wesley WILLIAMS, Antoine WRIGHT, Tanya HATCHER, and Harriet JACKSON, and occurring after December 2016 including, for each Account or identifier listed on Attachment A, information pertaining to the following matters:

- a. Specific descriptions of the records: “stored communications (1) between the email accounts jazzycouture2006@gmail.com, tamajaal2016@gmail.com, bagnontiti@gmail.com, bagnontitii@gmail.com, aduncan418@gmail.com, arwright135@gmail.com, thatcher022@gmail.com, my2als@gmail.com, mpeebles32@yahoo.com, abmasood@gmail.com, (2) between the accounts in Attachment A and any email accounts with @hmasolutionsllc, @infusedsolutions, @case-hcs, @rtmcpa, @mail.mil; (3) between the accounts in Attachment A and all known accounts for Harriet Jackson, Akbar Masood, and Michelle Peebles; and (4) all emails that include the terms: “Infused,” “HMA,” or “Walter Reed.”
- b. Evidence indicating how and when the Account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crime under investigation and to the email account owner;
- c. Evidence indicating the Account owner’s state of mind as it relates to the crime under investigation;
- d. The identity of the person(s) who created or used the Account, including records that help reveal the whereabouts of such person(s).

CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by [[**CHOOSE APPLICABLE: Google LLC AND/OR Google Payment Corporation**]] (“Google”), and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Google. The attached records consist of _____ [**GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)**]. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Google, and they were made by Google as a regular practice; and

b. such records were generated by Google’s electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Google in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Google, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

Date

Signature